

EXHIBIT G

Thursday, February 8, 2024 at 11:58:25 Eastern Standard Time

Subject: Re: Grace New England--217 Colby Road, Weare, NH
Date: Tuesday, December 12, 2023 at 6:34:46 PM Eastern Standard Time
From: Jeremy Dys
To: Laura Spector-Morgan, pm@marblaw.com
CC: Naomi Bolton, Tony Sawyer
Attachments: image001.jpg, image002.png
Ms. Spector-Morgan,

Thank you. We have received your email and will advise our client as appropriate.

Jeremy Dys
Senior Counsel
Chair, Religious Institutions
Practice Group
jdys@firstliberty.org



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From: Laura Spector-Morgan <laura@mitchellmunigroup.com>
Date: Sunday, December 10, 2023 at 12:26 PM
To: Jeremy Dys <jdys@firstliberty.org>, pm@marblaw.com <pm@marblaw.com>
Cc: Naomi Bolton <nbolton@wearenh.gov>, Tony Sawyer <tsawyer@wearenh.gov>
Subject: Grace New England--217 Colby Road, Weare, NH

Jeremy:

I am writing to follow up on our correspondence from early in November regarding the use of the barn on the property at 217 Colby Road in Weare, New Hampshire to hold religious services.

As you have correctly noted, Churches are a permitted use in the district; however, all non-residential uses in Weare require site plan approval, regardless of whether the use of the property is permitted by zoning or not. See RSA 674:43 and Weare Site Plan Review Regulations.

The use of the barn to hold religious services requires site plan approval, just as any other non-residential use would require. While you compare the use of the barn for church services to a birthday party or reading group, the use is not the same. The church is open to any member of the public who wishes to attend services or bible studies, and those gatherings are held every week, week after week, on Saturdays and Tuesdays. Therefore, issues such as parking, hours of operation, lighting, and the safety of those assembling in the barn are subject to review under both state and federal law.

Please instruct your client to apply for site plan approval within the next 30 days, or the town may choose to seek the assistance of the Hillsborough County Superior Court to require him to do so.

Thank you for your anticipated cooperation.

Laura

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